

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JASON FUHR, Individually, and as Executor of
the Estate of SHAUN FUHR, DAVONTA
TANIYA FUHR, individually.

Plaintiff,

vs.

CITY OF SEATTLE, and NOAH ZECH,

Defendants.

No. 2:23-cv-00600- BJR

**STIPULATED MOTION TO AMEND
PLAINTIFF'S COMPLAINT AND
ORDER¹**

IT IS HEREBY STIPULATED by and between Plaintiffs, JASON FUHR, individually and as the executor of the Estate of SHAUN FURH, and DAVONTA TANIYA FURH, individually, through their attorney, Jesse Valdez, and Defendants, CITY OF SEATTLE AND NOAH ZECH, through their attorneys of record, that leave should be granted to allow Plaintiff leave to file a First Amended Complaint pursuant to Rule 15(a) of the Federal Rules of Civil Procedure.

1. Plaintiffs filed their complaint on April 20, 2023.

¹Counsel filed the "Motion to Amend," incorrectly, as an "Amended Complaint," rather than as a motion. Accordingly, the Motion was never placed on the Court's calendar, and was not brought to the Court's attention until counsel emailed chambers a copy of the proposed order on February 1, 2024.

1 2. Plaintiffs' First Amended Complaint adds Davonta Taniya Fuhr as a party, and the causes of
2 action are otherwise materially unchanged.

3
4 NOW THEREFORE, the Plaintiffs request that the Court grant leave to file a First Amended
5 Complaint in this action, a true and correct copy of which is attached as Exhibit A hereto.

6 IT IS SO STIPULATED.

7 DATED this 3rd day of August 2023.
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9
10 By /s/ Jesse Valdez
11 Jesse Valdez, WSBA #35378
12 VALDEZ LEHMAN, PLLC.
Co-Counsel and Attorney for Plaintiff
Jason Fuhr, et. al.

13 DATED this 3rd of August 2023.
14

15 Agreed to by: /s/ Brandon Rain
16 Brandon Rain, WSBA# 45247
17 Rebecca Widen, WSBA# 57339
18 Seattle City Attorney's Office
701 Fifth Avenue, Suite 2050
Seattle, WA 98104
Attorneys for Defendants
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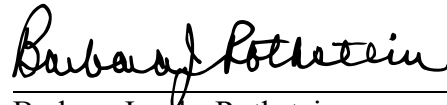
22 **ORDER**

23 Good cause appearing, and there being no objection, it is hereby ordered that Plaintiff is
24 granted leave to file the First Amended Complaint, which is attached hereto as Exhibit A.
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27 Stipulation and Order to File First
28 Amended Complaint for
Plaintiffs Jason Fuhr, et. al.

VALDEZ LEHMAN, PLLC
14205 SE 36th St. Ste 100
Bellevue, WA 98006
P: 425.458.4415

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2 Dated this February 1, 2024.

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4 _____
5 Barbara Jacobs Rothstein
6 U.S. District Court Judge
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27 Stipulation and Order to File First
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